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EX PARTE OR LATE FILED

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

Re: *Ex parte* presentation in CC Docket No. 94-102.

Dear Mr. Caton:

The attached document was delivered today to the Network Services Division of the Common Carrier Bureau for consideration in the above-referenced docket. The attachment reflects discussions between representatives of the Ad Hoc Telecommunications Users Committee, the Association of Public-Safety Communications Officials, the Multimedia Telecommunication Association and the National Emergency Number Association regarding issues in the above-referenced proceeding.

Sincerely,



James S. Blaszak
Counsel for the
Ad Hoc Telecommunications
Users Committee

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E911 / MLTS Discussion Paper

A. Business Settings

Level 1: Non-Dispersed Business MLTS

Multi-line telephone systems ("MLTS") that do not meet any of the criteria in Levels 2 or 3 below are non-dispersed business MLTS. Employers who utilize non-dispersed MLTS are not required to associate more than one ANI/ALI with such systems. Examples of non-dispersed business MLTS would include systems that serve only:

- A single-level building of no more than _____ square feet having its own public street address, or
- A workplace occupying no more than _____ square feet on a single level in a multi-level building having its own public street address. (See Note1)

Level 2: Dispersed Business MLTS

Employers who utilize MLTS in Level 2 environments would be required to associate one distinctive ANI/ALI per workplace level, unless they provide alternative and adequate means of signaling or responding to emergencies during ordinary work hours. One satisfactory alternative mechanism, but not the only mechanism, at this level would be a MLTS feature that provides notification to an attendant that a 9-1-1 call has been dialed, together with an indication to the attendant position of the source of the call. The adequacy of alternative means of signaling or responding to emergencies in Level 2 environments would be determined by appropriate workplace safety authorities operating pursuant to applicable legal requirements.

Dispersed Business Settings:

- Workplace "campuses" or "parks". MLTS that serve settings in which there are separate buildings having a common public street address. Each office or building of more than one level that does not provide alternative and adequate means of signaling or responding to emergencies should have a distinctive ANI/ALI associated with each level. (See Note 2)
- Office or Buildings of More Than One Level. As above, each office or building of two levels or more that does not provide alternative and adequate means of signaling or responding to emergencies should have a

distinctive ANI/ALI for each level, provided that the aggregate square footage of such a building is greater than _____ square feet.

Level 3: Multi-Location Business MLTS

If a MLTS serves multiple business locations with separate public street addresses (e.g., "off-premises extension," or "OPX"), the MLTS should be configured so that at least one distinct ALI/ANI is associated with each separate office level or single-level building served by the MLTS, unless the employer maintains, at all time, alternative and adequate means of signaling or responding to emergencies. As with Level 2 MLTS environments, appropriate workplace safety authorities would determine the adequacy of alternative means of signaling or responding to emergencies.

B. Hotel/Motel and Permanent Residential MLTS

Level 1: Small Hotel/Motel MLTS

Operators of MLTS serving small hotel/motel settings are not required to associate more than one ANI/ALI per site. (See Note 3)

Level 2: Permanent Residential and Large Hotel/Motel MLTS

Operators of MLTS serving permanent residential and large hotel/motel settings are required to associate at least one distinctive ANI/ALI with each living unit unless the facility maintains, at all times, alternative and adequate means of signaling or responding to emergencies. One such alternative means would be a MLTS feature that provides notifications to an attendant that a 9-1-1 call has been dialed together with an indication to the attendant position as to the source of the call.

C. General provisions

Inconsistent state and local regulation of MLTS is preempted. (See Note 4) Where state E911 MLTS compatibility laws affecting residential and non-affiliated business settings already are effective, they are not meant to be preempted solely by variance from federal effective dates set forth below.

MLTS serving in permanent residential and MLTS installed in large hotel/motel settings after _____ must meet Level 2 requirements by _____. MLTS installed in business settings, except Level 1 environments, after _____ must meet Level 2 or Level 3 requirements, as applicable. (See Note 5)

Level 2 and 3 ANI/ALI requirements need not include the capability to receive "call backs" from public safety personnel.

This section does not apply where E911 and ANI and ALI features are not in operation or available. Waiver is available to MLTS owners who can demonstrate that reasonable means do not exist for connecting their equipment to the public switched telephone network to transmit multiple ANI/ALIs.

Nothing in this section is intended to relieve employers of their obligations under federal and state workplace occupational safety and health statutes and rules.

Note 1: The parties to these discussions have been unable to agree on a square footage parameter and on whether Level 1 should include multi-level workplaces totaling no more than _____ square feet.

Note 2: Dispersed and multi-location businesses include non-residential schools.

Note 3: This assumes that most small hotel/motel settings will meet the criteria of Level 1 businesses or will have an office as a point of contact for emergency responders.

Note 4: APCO takes no position as to FCC preemption of inconsistent state and local regulation of MLTS.

Note 5: The parties to these discussions are still negotiating regarding transition periods and grandfathering.